

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS FRANK NERI
(APWU/USPS-T4-20-21)
(February 23, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Frank Neri (USPS-T-16). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T4-20 Page 16, Line 20 of your testimony states that “these changes in service standards for FCM would apply to FCM letters, flats and parcels.”

- a) Please confirm that FCM parcels will be affected in the same way as FCM letter as a result of these changes.
- b) If you cannot confirm, please explain any differences in the way FMC parcels will be affected.
- c) What percentage of FCM parcels will see a change (reduction) in service standards, at each commitment level of overnight/1-day, 2-day and 3-day?
- d) What percentages of FCM parcels originate from each class of customer, including National Accounts, Preferred Accounts, Small Business and Consumer?
- e) What percentages of customers are expected to be affected by the service standard changes in each category of customer including National Accounts, Preferred Accounts, Small Business, and Consumer?

APWU/USPS-T4-21 How are FCM parcels processed in network plants and facilities?

- a) How many facilities have automated parcel sorting equipment?
- b) Do all mail processing facilities handle FCM parcels?
- c) Do facilities with parcel sorting equipment NOW co-process other sub-categories of parcel products, such as Standard Mail parcels, Package Mail and Priority mail, with FCM parcels on the same equipment, in the same shifts? Will this change if the service standards for FCM change?
- d) Are FCM parcels co-processed with FCM letters in a more general fashion, such as co-processing on the same shift, with the same CET times, etc?
- e) With the planned relaxation of service standards for FCM parcels, what will be the changes in any of these co-processing modes relative to other sub-categories of parcels in market-dominant and competitive classes?